

# **EXHIBIT 3**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan  
Aaron Polster

The County of Cuyahoga v. Purdue  
Pharma, L.P., et al.  
Case No. 17-OP-45005  
City of Cleveland, Ohio vs. Purdue  
Pharma, L.P., et al.  
Case No. 18-OP-45132  
The County of Summit, Ohio,  
et al. v. Purdue Pharma, L.P.,  
et al.  
Case No. 18-OP-45090

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Videotaped Deposition of Joseph Rannazzisi  
Washington, D.C.  
April 26, 2019  
8:37 a.m.

Reported by: Bonnie L. Russo  
Job No. 3301876

1       that you would get paid for your work with the  
2       Fields firm?

3               MR. UTTER:   You can answer that.

4               THE WITNESS:   Yes.

5               BY MR. EPPICH:

6               Q.       Did you sign a contract with them?

7               A.       Yes.

8               Q.       How much are you paid per hour?

9               MR. UTTER:   You can answer.

10              THE WITNESS:   \$500 an hour.

11              BY MR. EPPICH:

12              Q.       And how many hours have you billed  
13       to date?

14              MR. UTTER:   That I would instruct  
15       you not to answer.

16              THE WITNESS:   I don't --

17              MR. UTTER:   That I would instruct  
18       you not to answer.

19              SPECIAL MASTER COHEN:   No, you can  
20       answer that question.

21              MR. UTTER:   Go ahead.

22              THE WITNESS:   I don't know.

23              BY MR. EPPICH:

24              Q.       Do you know how much money you  
25       received from the Fields firm to date?

1 MR. UTTER: Go ahead.

2 THE WITNESS: I don't know.

3 BY MR. EPPICH:

4 Q. Is it more than \$10,000?

5 A. Yes.

6 Q. More than \$50,000?

7 A. Yes.

8 Q. More than \$100,000?

9 A. I would say yes.

10 Q. More than a quarter million dollars?

11 A. No.

12 Q. Are you billing the Fields firm for  
13 your testimony here today?

14 A. No.

15 Q. Are you billing the Fields firm for  
16 your preparation sessions for this deposition  
17 today?

18 A. No.

19 Q. Are you being compensated by any  
20 lawyer or entity for your testimony here today  
21 or the preparations for your testimony here  
22 today?

23 A. Well, I was under the impression I  
24 got a witness fee from the defendants.

25 Q. Other than that?

1       that question for you. You did not ask him,  
2       what did you tell registrants about what was an  
3       unusual size which is what would be within No.  
4       3.

5                   BY MS. MAINIGI:

6           Q.       Well, let's make sure we do both,  
7       Mr. Rannazzisi.

8                   You gave me your definition of  
9       unusual size, correct?

10          A.       Yes.

11          Q.       And I think you also told me earlier  
12       that you don't recall yourself elaborating for  
13       any registrant as you did in this deposition,  
14       what unusual size meant to you, correct?

15                   MS. SINGER: Objection. Misstates  
16       prior testimony.

17                   MR. BENNETT: I join that objection.

18                   MR. UTTER: Same objection.

19                   Go ahead.

20                   THE WITNESS: I don't -- I haven't  
21       had the opportunity -- well, I have never told  
22       a registrant what their responsibility is as  
23       far as what my definition of a suspicious order  
24       is. That would have come from my staff or the  
25       liaison policy section or the pharmaceutical

1 investigation section or E-commerce, you know,  
2 if they were still there, but it wouldn't have  
3 come from my office directly.

4 BY MS. MAINIGI:

5 Q. And were you ever aware of any  
6 definition that could have been offered by one  
7 of your staff to registrants?

8 A. I wasn't aware of what -- they were  
9 trained, they are trained to follow what the  
10 regulation says, and I'm sure they can give  
11 examples just like I just did, but no, I am not  
12 aware of any specific guidance that they gave.  
13 I mean, we had companies calling in for all  
14 different types of issues, not just related to  
15 suspicious orders. They were trained to give  
16 guidance based on the regs and the Controlled  
17 Substances Act.

18 Q. Companies would call in, though, I  
19 take it, to ask for further elaboration on the  
20 definition of a suspicious order, correct?

21 MS. SINGER: Objection. Foundation.

22 MR. BENNETT: Same objection.

23 THE WITNESS: Companies have called  
24 in to liaison and policy and also to -- back  
25 when E-commerce was E-commerce and other

1           Q.       So you, yourself, have never even  
2 inspected a suspicious order monitoring system,  
3 fair?

4           MR. BENNETT:   Objection.   Misstates  
5 testimony.   Objection.   Scope.

6           THE WITNESS:   I have never gone on  
7 site and reviewed a suspicious order monitoring  
8 system, no.

9           BY MS. MAINIGI:

10          Q.       Have you ever viewed one on paper?

11          MR. SMITH:   Objection.   Scope.

12          THE WITNESS:   I may have looked  
13 years ago at the framework of a suspicious  
14 order monitoring system on paper.

15          BY MS. MAINIGI:

16          Q.       Do you have an understanding of what  
17 would separate an acceptable compliance  
18 suspicious order monitoring system from one  
19 that was not compliant with regulations?

20          MS. SINGER:   Objection.   Vague.  
21 Foundation.   Scope.

22          MR. BENNETT:   Join the scope  
23 objection.

24          MR. UTTER:   Go ahead.

25          THE WITNESS:   Again, the suspicious